

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(01) GERALD L. GINNINGS,
[DOB: 01/02/1980],

(02) TREVOR SCOTT SPARKS,
[DOB: 02/09/1989],

(03) MARKUS MICHAEL A. PATTERSON,
[DOB: 12/12/1982],

(04) GLORIA MAY JONES,
[DOB: 8/31/1989],

(05) VICENTE ARAUJO,
[DOB: 9/20/1996],

(06) LESLIE LADON WALKER,
[DOB: 7/2/1987],

(07) DAVID ROBERT RICHARDS II,
[DOB: 10/19/1987],

(08) CHRISTIAN DOUGLAS HANSEN,
[DOB: 04/14/1979],

(09) STEPHANIE THURMOND,
[DOB: 11/2/1990],

(10) LEEANNA MICHELLE SCHROEDER,
[DOB: 6/4/1993],

(11) ADAM JOSEPH MAINIERI,
[DOB: 3/1/1988],

Case No. 18-00293-01/25-CR-W-DGK

COUNT ONE: All Defendants EXCEPT Sparks

(Conspiracy Distribute Methamphetamine)

21 U.S.C. §§ 841(a)(1), (b)(1)(A) & 846

NLT: 10 Years Imprisonment

NMT: Life Imprisonment

NMT: \$10,000,000 Fine

NLT: 5 Years Supervised Release

Class A Felony

COUNT TWO: All Defendants

(Conspiracy to Commit Money Laundering)

18 U.S.C. §§ 1956(a)(1)(A)(i),(B)(i),(ii), & (h)

NMT: Twenty Years Imprisonment

NMT: \$500,000 Fine

NMT: Three Years Supervised Release

Class C Felony

COUNT THREE: Defendant SPARKS only
(Continuing Criminal Enterprise)

21 U.S.C. §§ 848(a)(b)(c) & (s)

NLT 20 Years Imprisonment

NMT Life Imprisonment

NMT \$2,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

COUNT FOUR: All Defendants EXCEPT Kibodeaux, Rogan, and McClure

(Possess Firearms with Drug Trafficking)

18 U.S.C. § 924(c)(1)(A)(i)

NLT: 5 Years and NMT Life Imprisonment

NMT: \$250,000 Fine

NMT: 5 Years Supervised Release

Class A Felony

(12) PAUL J. KIBODEAUX,
[DOB: 4/22/1983],

(13) KOURTNEY JAYNE MEYERS,
[DOB: 01/16/1989],

(14) CORY TAZ-DALTON HACK,
[DOB: 06/26/1995],

(15) RORY DALE BECHTEL,
[DOB: 04/14/1983],

(16) PHILLIP TRA JOSEPH HOYT,
[DOB: 08/12/1976],

(17) BOBBIE LYNN KING,
[DOB: 07/05/1969],

(18) LOGAN TANNER LAWS,
[DOB: 10/09/1991],

(19) KENNETH JAMES MCCLURE,
[DOB: 02/09/1979],

(20) MARION DOUGLAS MCCROREY
JR.,
[DOB: 10/05/1979],

(21) PATRICIA GAIL NELSON, AKA
MCCOLLUM, AKA "MAMA PAT,"
[DOB: 06/21/1960],

(22) CHRISTAPHER DEAN PARTON,
[DOB: 04/25/1989],

(23) CHRISTOPHER BRIAN ROGAN,
[DOB: 01/21/1976],

(24) AMANDA LEIGH WATSON,
[DOB: 05/09/1987],

(25) MICHAEL GLEN ZIEGER, AKA
ZIEGLER, AKA "LEE SUMMIT MIKE,"
[DOB: 08/25/1976],

Defendants.

**COUNT FIVE: Defendants Ginnings,
Sparks, Patterson, Jones, Hansen, Mainieri,
Hoyt, King, Nelson, Zieger, only**

(Felon Possess Firearm and Ammunition)

18 U.S.C. §§ 922(g)(1) & 924(a)(2)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

**COUNT SIX: Defendants Araujo, Walker,
Thurmond, Schroeder, Meyers, Hack,
Bechtel, Laws, and Parton, only**

**(Drug User in Possession of Firearms and
Ammunition)**

18 U.S.C. §§ 922(g)(3) and 924(a)(2)

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

ALLEGATION OF CRIMINAL

FORFEITURE: All Defendants

21 U.S.C. § 853 and 18 U.S.C. § 982(a)(1)

\$100 Mandatory Special Assessment for each
count of conviction

THIRD SECRET SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE – all Defendants EXCEPT Sparks
(Conspiracy to Distribute more than 500 Grams of Methamphetamine)

Between on or about January 1, 2017, and July 21, 2020, the exact dates unknown to the Grand Jury, within the Western District of Missouri and other places, GERALD L. GINNINGS, MARKUS MICHAEL A. PATTERSON, GLORIA MAY JONES, VICENTE ARAUJO, LESLIE LADON WALKER, DAVID ROBERT RICHARDS, II, CHRISTIAN DOUGLAS HANSEN, STEPHANIE THURMOND, LEEANNA MICHELLE SCHROEDER, ADAM JOSEPH MAINIERI, PAUL J. KIBODEAUX, KOURTNEY JAYNE MEYERS, CORY TAZ-DALTON HACK, RORY DALE BECHTEL, PHILLIP TRA JOSEPH HOYT, BOBBIE LYNN KING, LOGAN TANNER LAWS, KENNETH JAMES MCCLURE, MARION DOUGLAS MCCROREY JR., PATRICIA GAIL NELSON, A/K/A MCCOLLUM, CHRISTAPHER DEAN PARTON, CHRISTOPHER BRIAN ROGAN, AMANDA LEIGH WATSON, and MICHAEL GLEN ZIEGER, A/K/A ZIEGLER, defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and others, both known and unknown to the Grand Jury, to distribute five-hundred (500) grams and more of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and 846.

COUNT TWO – all Defendants
(Conspiracy to commit Money Laundering)

Between on or about January 1, 2017, and July 21, 2020, the exact dates unknown to the Grand Jury, within the Western District of Missouri and other places, GERALD L. GINNINGS, TREVOR SCOTT SPARKS, MARKUS MICHAEL A. PATTERSON, GLORIA MAY JONES, VICENTE ARAUJO, LESLIE LADON WALKER, DAVID ROBERT RICHARDS, II, CHRISTIAN DOUGLAS HANSEN, STEPHANIE THURMOND, LEEANNA MICHELLE SCHROEDER, ADAM JOSEPH MAINIERI, PAUL J. KIBODEAUX, KOURTNEY JAYNE MEYERS, CORY TAZ-DALTON HACK, RORY DALE BECHTEL, PHILLIP TRA JOSEPH HOYT, BOBBIE LYNN KING, LOGAN TANNER LAWS, KENNETH JAMES MCCLURE, MARION DOUGLAS MCCROREY JR., PATRICIA GAIL NELSON, A/K/A MCCOLLUM, CHRISTAPHER DEAN PARTON, CHRISTOPHER BRIAN ROGAN, AMANDA LEIGH WATSON, and MICHAEL GLEN ZIEGER, A/K/A ZIEGLER, defendants herein, and others, both known and unknown to the Grand Jury, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, both known and unknown to the Grand Jury, to conduct financial transactions which in fact involved the proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 846, as charged in **Count One** of this superseding indictment, with the intent to promote the carrying on of that specified unlawful activity, to wit: items of value, including cash, obtained from illegal controlled substance sales (*i.e.* “proceeds”) were used in whole or part to purchase additional controlled substances for sale, thus promoting the charged conspiracy, and additionally, knowing the

transactions were designed to conceal the nature, source, location, ownership, and control of the said proceeds and to avoid reporting requirements, in that cash, obtained from controlled substance sales (*i.e.*, “proceeds”), was then deposited, in whole or part, into various financial institution accounts or stored, used, transmitted, or transported in such a manner as to conceal its true nature, source, location ownership, and control, and to avoid bank reporting requirements, all thus concealing the proceeds from the drug conspiracy.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (B)(i), (ii) and (h).

The object of the conspiracy was to use drug sale proceeds to promote the drug trafficking conspiracy charged in **Count One** and to conceal drug sale proceeds of that drug trafficking conspiracy.

The manner and means by which the conspiracy was sought to be accomplished included, among others, the following:

1. It was part of the conspiracy that its members would and did buy and sell illicit drugs.
2. It was further a part of the conspiracy that its members would and did obtain proceeds, in different ways or forms, from said buying and selling of illicit drugs.
3. It was further a part of the conspiracy that its members would and did treat the said proceeds in such a manner as to conceal the nature, source, location, ownership, and control of said proceeds and to avoid reporting requirements of said proceeds.
4. It was further a part of the conspiracy that its members would and did promote the conspiracy by exchanging items of value they obtained in a variety of manners for drugs to use and sale.

5. It was further a part of the conspiracy that its members would and did promote the conspiracy by obtaining additional illicit drugs for distribution with said proceeds.

6. It was further part of the conspiracy that its members would and did obtain assets with cash drug proceeds and did not identify the cash as drug proceeds.

7. It was further a part of the conspiracy that its members would and did deposit or transmit cash drug proceeds in and with various financial institutions and money transmitting businesses and not identify them as drug proceeds.

In furtherance of the conspiracy and to affect the objects of the conspiracy, the following overt acts, among others, were committed in the Western District of Missouri and elsewhere:

1. During the conspiracy period, conspirators both charged and uncharged, paid cash for controlled substances, thereby obscuring the drug trafficking conspiracy.

2. During the conspiracy period, conspirators packaged, transported, stored and used said proceeds without revealing their true source and in a manner as to conceal that true source.

3. During the conspiracy period, conspirators operated with coded terms and maintained coded records of drug amounts sold and cash proceeds collected or owed for drugs, thereby obscuring the nature and source of the cash.

4. During the conspiracy period, conspirators used cash proceeds from drug sales to fund other activities such as real property purchases, personal property purchases, travel, and living expenses, thereby obscuring the nature, source, or ownership of the cash.

5. During the conspiracy period, cash from drug sale proceeds was deposited, transmitted, or stored in such a manner so as to not reveal its source, location, or ownership and to avoid reporting requirements.

6. During the conspiracy, on multiple occasions, conspirators took cash obtained from drug sales and used those drug sale proceeds to purchase additional controlled substances.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (B)(i), (ii) and (h).

COUNT THREE
(Continuing Criminal Enterprise – Defendant SPARKS only)

Between on or about January 1, 2017, and July 21, 2020, the exact dates unknown to the Grand Jury, in the Western District of Missouri and other places, TREVOR SCOTT SPARKS, defendant herein, did knowingly and intentionally engage in a continuing criminal enterprise by knowingly and intentionally violating Title 21, United States Code, Sections 841 *et seq.*, which violations include, but are not limited to, the violations contained in, referenced in and supporting Count One of this superseding indictment, which violations are all re-alleged and incorporated herein as if set out word for word, and said violations were part of a continuing series of violations of Title 21, United States Code, Sections 801, *et seq.*, undertaken by the defendant, TREVOR SCOTT SPARKS, in concert with five or more other persons, which could include but not be limited to indicted and unindicted co-conspirators and others, including the defendants listed in this indictment, with respect to whom Defendant TREVOR SCOTT SPARKS occupied a position of organizer, supervisor, or manager and from this ongoing criminal enterprise the defendant, TREVOR SCOTT SPARKS, obtained substantial income or resources.

Furthermore, the defendant, TREVOR SCOTT SPARKS, was the principal administrator, organizer or leader of the continuing criminal enterprise and which involved possession with intent to distribute and distribution of a mixture or substance containing methamphetamine in an amount of at least 10,000 grams and which received \$5,000,000.00 in gross receipts during any 12-month period of its existence.

All in violation of Title 21, United States Code, Sections 848 (a)(b)(c) and (s).

COUNT FOUR

All Defendants EXCEPT Defendant KIBODEAUX, ROGAN, and MCCLURE
(Possession of Firearms and Drug Trafficking)

On or about between January 1, 2017, and July 21, 2020, within the Western District of Missouri, and other places, but all related to crimes of violence and drug trafficking crimes within the Western District of Missouri, the defendants, GERALD L. GINNINGS, TREVOR SCOTT SPARKS, MARKUS MICHAEL A. PATTERSON, GLORIA MAY JONES, VICENTE ARAUJO, LESLIE LADON WALKER, DAVID ROBERT RICHARDS, II, CHRISTIAN DOUGLAS HANSEN, STEPHANIE THURMOND, LEEANNA MICHELLE SCHROEDER, ADAM JOSEPH MAINIERI, KOURTNEY JAYNE MEYERS, CORY TAZ-DALTON HACK, RORY DALE BECHTEL, PHILLIP TRA JOSEPH HOYT, BOBBIE LYNN KING, LOGAN TANNER LAWS, MARION DOUGLAS MCCROREY JR., PATRICIA GAIL NELSON, A/K/A/ MCCOLLUM, CHRISTAPHER DEAN PARTON, AMANDA LEIGH WATSON, and MICHAEL GLEN ZIEGER, A/K/A ZIEGLER in furtherance of and during and in relation to crimes of violence and drug trafficking crimes for which they may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: a Beretta 92S 9 mm semi-automatic handgun, serial number U22039Z; Smith and Wesson 40 caliber semi-automatic handgun serial number DTL2346; Glock model 22

semiautomatic handgun serial number NBW256; VMAC MAC 11 .45 caliber handgun, serial number P14280; WISE .223 AR pistol serial number 11969; M92PV AK47 pistol serial number M92PV065595; a Marlin, .22 caliber long rifle Serial Number 22347947, a Cobra SF380, .380 caliber semi-automatic pistol, serial number FS0999788; tan in color (“peanut butter”) Glock 19, 9 mm semi-automatic pistol, serial number ABZX738; CAI, Model PepM9P2V, 7.62 x 39 mm pistol, bearing serial number M92PV065595; Glock 19, 9 mm semi-automatic firearm, bearing serial number BAZK342; 20 ga. firearm, make and model obliterated, serial number H380221; Glock 19, 9 mm semi-automatic handgun, serial number ACHY981; Glock 22 .40 caliber semi-automatic handgun, serial number BHAK692; IO Inc Inter Ordnance multi-caliber pistol serial number SDW-00160; Taurus 9 mm serial number THP36424; Glock 20, 10 mm semi-automatic handgun, serial number BDDK234; Zastava Pap 7.62 caliber rifle, serial number M92PV029294; Stag Arms model STAG-15, semi-automatic AR15 pistol, serial number 64773; American Tactical Imports, model OMNI HYBRID, multi-caliber AR 15 rifle, serial number N5167731; Century Arms International, Model M85NP 7.62 x 39 semiautomatic handgun, serial number M85-NP00959; Century Arms International, Model M92PV, AR 15 7.62 x 39 semiautomatic handgun, serial number M92PV029294; Winchester 1200, 12 ga. shotgun, serial number 3815; MAVERICK 88 by Mossberg 12 ga. shotgun, serial number MV0105656; Taurus PT111G2 9 mm semi-automatic pistol, serial number TKN19799; GLOCK 22, .40 caliber semi-automatic pistol, serial number RMX867; Smith and Wesson SD40VE .40 caliber semiautomatic handgun, serial number HEY3705; RUGER EC9S 9 mm semi-automatic pistol, serial number 455-03954; Taurus model PT111G2, 9 mm semi-automatic pistol, serial number TLS49750; Mossberg model 500 12 ga. shotgun, serial number U117427; Smith and Wesson SD9BE 9 mm semi-automatic pistol, serial number HEB0953; Masterpiece Arms 9 mm semi-automatic pistol, serial number F15965;

American Tactical, MSA 011215, 55.5 x 45 rifle; Smith and Wesson MP9, serial number NBK5663; N- Papa, 7.62 x 39 mm rifle, serial number N-PAP021048; Romarm SAR2 5.45mm x 39mm rifle, serial number S2-06645-2002; Ruger 10-22, .22LR rifle, serial number 128-20343; Unknown manufacturer, .22 caliber AK - 47, serial number 794002; Anderson Manufacturing, AM-15, Multi Cal 5.56 pistol, serial number 17052123; Taurus PT 92 AFS. 9 mm semiautomatic handgun, serial number TCX53200; Taurus PT111G2, 9 mm semiautomatic handgun, serial number TJX32101; Taurus, 357 magnum revolver, model 605, serial number G528419; Glock 30S, .45 caliber semiautomatic handgun, serial number BEVH508, Smith and Wesson SD 40, .40 caliber semiautomatic handgun, serial number FBJ2425, SCCY 9 mm semiautomatic handgun serial number 19603, Remington 870 shotgun serial number B668792M, two Jiminez Arms 9 mm semiautomatic handguns, serial numbers 384170 and 410835, TC Montgomery double barrel shotgun, serial number 71276, Connecticut Valley Arms .50 caliber rifle serial number 87130368, two S&W SW 40 VE .40 caliber semiautomatic handguns serial numbers DMV7530 and HEY3705, Taurus G2C 9 mm semiautomatic handgun serial number TLS49750, two Ruger EC9S 9 mm semiautomatic handguns serial numbers 455-03954 and 454-99301, Taurus PT111G2 9 mm semiautomatic handgun serial number TKN19799, Raven Arms MP-25 .25 caliber semiautomatic handgun, SCCY CPX-2 9 mm semiautomatic handgun, S&W M&P-15 rifle serial number 42469, and various ammunition, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

COUNT FIVE

Defendants Ginnings, Sparks, Patterson, Jones, Hansen, Mainieri, Hoyt, King, Nelson, and Zieger, only

(Felon in Possession of a Firearm and Ammunition)

On or about between January 1, 2017, and July 21, 2020, within the Western District of Missouri, GERALD L. GINNINGS, TREVOR SCOTT SPARKS, MARKUS MICHAEL A. PATTERSON, GLORIA MAY JONES, CHRISTIAN DOUGLAS HANSEN, ADAM JOSEPH MAINIERI, PHILLIP TRA JOSEPH HOYT, BOBBIE LYNN KING, PATRICIA GAIL NELSON, A/K/A/MCCOLLUM and MICHAEL GLEN ZIEGER, A/K/A ZIEGLER, defendants herein, knowing they had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms and ammunition, to wit: a Beretta 92S 9 mm semi-automatic handgun, serial number U22039Z; Smith and Wesson 40 caliber semi-automatic handgun serial number DTL2346; Glock model 22 semiautomatic handgun serial number NBW256; VMAC MAC 11 .45 caliber handgun, serial number P14280; WISE .223 AR pistol serial number 11969; M92PV AK47 pistol serial number M92PV065595; a Marlin, .22 caliber long rifle Serial Number 22347947, a Cobra SF380, .380 caliber semi-automatic pistol, serial number FS0999788; tan in color (“peanut butter”) Glock 19, 9 mm semi-automatic pistol, serial number ABZX738; CAI, Model PepM9P2V, 7.62 x 39 mm pistol, bearing serial number M92PV065595; Glock 19, 9 mm semi-automatic firearm, bearing serial number BAZK342; 20 ga. firearm, make and model obliterated, serial number H380221; Glock 19, 9 mm semi-automatic handgun, serial number ACHY981; Glock 22 .40 caliber semi-automatic handgun, serial number BHAK692; IO Inc Inter Ordnance multi-caliber pistol serial number SDW-00160; Taurus 9 mm serial number THP36424; Glock 20, 10 mm semi-automatic handgun, serial number BDDK234; Zastava Pap 7.62 caliber rifle, serial number M92PV029294;

Stag Arms model STAG-15, semi-automatic AR15 pistol, serial number 64773; American Tactical Imports, model OMNI HYBRID, multi-caliber AR 15 rifle, serial number N5167731; Century Arms International, Model M85NP 7.62 x 39 semiautomatic handgun, serial number M85-NP00959; Century Arms International, Model M92PV, AR 15 7.62 x 39 semiautomatic handgun, serial number M92PV029294; Winchester 1200, 12 ga. shotgun, serial number 3815; MAVERICK 88 by Mossberg 12 ga. shotgun, serial number MV0105656; Taurus PT111G2 9 mm semi-automatic pistol, serial number TKN19799; GLOCK 22, .40 caliber semi-automatic pistol, serial number RMX867; Smith and Wesson SD40VE .40 caliber semiautomatic handgun, serial number HEY3705; RUGER EC9S 9 mm semi-automatic pistol, serial number 455-03954; Taurus model PT111G2, 9 mm semi-automatic pistol, serial number TLS49750; Mossberg model 500 12 ga. shotgun, serial number U117427; Smith and Wesson SD9BE 9 mm semi-automatic pistol, serial number HEB0953; Masterpiece Arms 9 mm semi-automatic pistol, serial number F15965; American Tactical, MSA 011215, 55.5 x 45 rifle; Smith and Wesson MP9, serial number NBK5663; N- Papa, 7.62 x 39 mm rifle, serial number N-PAP021048; Romarm SAR2 5.45mm x 39mm rifle, serial number S2-06645-2002; Ruger 10-22, .22LR rifle, serial number 128-20343; Unknown manufacturer, .22 caliber AK - 47, serial number 794002; Anderson Manufacturing, AM-15, Multi Cal 5.56 pistol, serial number 17052123; Taurus PT 92 AFS. 9 mm semiautomatic handgun, serial number TCX53200; Taurus PT111G2, 9 mm semiautomatic handgun, serial number TJX32101; Taurus, 357 magnum revolver, model 605, serial number G528419; Glock 30S, .45 caliber semiautomatic handgun, serial number BEVH508, Smith and Wesson SD 40, .40 caliber semiautomatic handgun, serial number FBJ2425, SCCY 9 mm semiautomatic handgun serial number 19603, Remington 870 shotgun serial number B668792M, two Jiminez Arms 9 mm semiautomatic handguns, serial numbers 384170 and 410835, TC Montgomery double barrel

shotgun, serial number 71276, Connecticut Valley Arms .50 caliber rifle serial number 87130368, two S&W SW 40 VE .40 caliber semiautomatic handguns serial numbers DMV7530 and HEY3705, Taurus G2C 9 mm semiautomatic handgun serial number TLS49750, two Ruger EC9S 9 mm semiautomatic handguns serial numbers 455-03954 and 454-99301, Taurus PT111G2 9 mm semiautomatic handgun serial number TKN19799, Raven Arms MP-25 .25 caliber semiautomatic handgun, SCCY CPX-2 9 mm semiautomatic handgun, S&W M&P-15 rifle serial number 42469, and various ammunition, all which had been transported in interstate commerce, all contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT SIX

Defendants Araujo, Walker, Thurmond, Schroeder, Meyers, Hack, Bechtel, Laws, and Parton,
only
(Drug User in Possession of Firearms and Ammunition)

On or about between January 1, 2017, and July 21, 2020, in the Western District of Missouri, and other places, the defendants, VICENTE ARAUJO, LESLIE LADON WALKER, STEPHANIE THURMOND, LEEANNA MICHELLE SCHROEDER, KOURTNEY JAYNE MEYERS, CORY TAZ-DALTON HACK, RORY DALE BECHTEL, LOGAN TANNER LAWS, AND CHRISTAPHER DEAN PARTON, being unlawful users of and addicted to controlled substances as defined in Title 21, United States Code, Section 802, including methamphetamine, cocaine, and marijuana, did knowingly possess, in and affecting commerce, firearms and ammunition, to wit: a Beretta 92S 9 mm semi-automatic handgun, serial number U22039Z; Smith and Wesson 40 caliber semi-automatic handgun serial number DTL2346; Glock model 22 semiautomatic handgun serial number NBW256; VMAC MAC 11 .45 caliber handgun, serial number P14280; WISE .223 AR pistol serial number 11969; M92PV AK47 pistol serial number M92PV065595; a Marlin, .22 caliber long rifle Serial Number 22347947, a Cobra SF380,

.380 caliber semi-automatic pistol, serial number FS0999788; tan in color (“peanut butter”) Glock 19, 9 mm semi-automatic pistol, serial number ABZX738; CAI, Model PepM9P2V, 7.62 x 39 mm pistol, bearing serial number M92PV065595; Glock 19, 9 mm semi-automatic firearm, bearing serial number BAZK342; 20 ga. firearm, make and model obliterated, serial number H380221; Glock 19, 9 mm semi-automatic handgun, serial number ACHY981; Glock 22 .40 caliber semi-automatic handgun, serial number BHAK692; IO Inc Inter Ordnance multi-caliber pistol serial number SDW-00160; Taurus 9 mm serial number THP36424; Glock 20, 10 mm semi-automatic handgun, serial number BDDK234; Zastava Pap 7.62 caliber rifle, serial number M92PV029294; Stag Arms model STAG-15, semi-automatic AR15 pistol, serial number 64773; American Tactical Imports, model OMNI HYBRID, multi-caliber AR 15 rifle, serial number N5167731; Century Arms International, Model M85NP 7.62 x 39 semiautomatic handgun, serial number M85-NP00959; Century Arms International, Model M92PV, AR 15 7.62 x 39 semiautomatic handgun, serial number M92PV029294; Winchester 1200, 12 ga. shotgun, serial number 3815; MAVERICK 88 by Mossberg 12 ga. shotgun, serial number MV0105656; Taurus PT111G2 9 mm semi-automatic pistol, serial number TKN19799; GLOCK 22, .40 caliber semi-automatic pistol, serial number RMX867; Smith and Wesson SD40VE .40 caliber semiautomatic handgun, serial number HEY3705; RUGER EC9S 9 mm semi-automatic pistol, serial number 455-03954; Taurus model PT111G2, 9 mm semi-automatic pistol, serial number TLS49750; Mossberg model 500 12 ga. shotgun, serial number U117427; Smith and Wesson SD9BE 9 mm semi-automatic pistol, serial number HEB0953; Masterpiece Arms 9 mm semi-automatic pistol, serial number F15965; American Tactical, MSA 011215, 55.5 x 45 rifle; Smith and Wesson MP9, serial number NBK5663; N- Papa, 7.62 x 39 mm rifle, serial number N-PAP021048; Romarm SAR2 5.45mm x 39mm rifle, serial number S2-06645-2002; Ruger 10-22, .22LR rifle, serial number 128-20343;

Unknown manufacturer, .22 caliber AK - 47, serial number 794002; Anderson Manufacturing, AM-15, Multi Cal 5.56 pistol, serial number 17052123; Taurus PT 92 AFS. 9 mm semiautomatic handgun, serial number TCX53200; Taurus PT111G2, 9 mm semiautomatic handgun, serial number TJX32101; Taurus, 357 magnum revolver, model 605, serial number G528419; Glock 30S, .45 caliber semiautomatic handgun, serial number BEVH508, Smith and Wesson SD 40, .40 caliber semiautomatic handgun, serial number FBJ2425, SCCY 9 mm semiautomatic handgun serial number 19603, Remington 870 shotgun serial number B668792M, two Jiminez Arms 9 mm semiautomatic handguns, serial numbers 384170 and 410835, TC Montgomery double barrel shotgun, serial number 71276, Connecticut Valley Arms .50 caliber rifle serial number 87130368, two S&W SW 40 VE .40 caliber semiautomatic handguns serial numbers DMV7530 and HEY3705, Taurus G2C 9 mm semiautomatic handgun serial number TLS49750, two Ruger EC9S 9 mm semiautomatic handguns serial numbers 455-03954 and 454-99301, Taurus PT111G2 9 mm semiautomatic handgun serial number TKN19799, Raven Arms MP-25 .25 caliber semiautomatic handgun, SCCY CPX-2 9 mm semiautomatic handgun, S&W M&P-15 rifle serial number 42469, and various ammunition, all which had been transported in interstate commerce and all in violation of Title 18, United State Code, Sections 922(g)(3) and 924(a)(2).

ALLEGATIONS OF FORFEITURE

The allegations contained in **Counts One, Two, and Three** of this indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture, respectively, pursuant to the provisions of Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1).

Upon conviction of **Count One**, each defendant named herein shall forfeit to the United States all property, real and personal, constituting or derived from any proceeds the defendant obtained directly and indirectly as a result of the violation incorporated by reference in this Allegation of Forfeiture and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violation incorporated by reference in this allegation, including, but not limited to, a **money judgment of approximately \$4,160,000.00** in United States currency, and any interest and proceeds traceable thereto, in that at least this sum, in aggregate, was received in exchange for, or is traceable thereto, the unlawful distribution of more than 520 kilograms of methamphetamine, based on an average street price of \$8000.00 per kilogram.

Upon conviction of **Count Two**, each defendant shall forfeit to the United States any property, real or personal, involved in such offense or any property traceable to such property, including, but not limited to, a **money judgment of approximately \$4,160,000.00** in United States currency, and any interest and proceeds traceable thereto, in that at least this sum, in aggregate, was involved in the money laundering conspiracy.

Upon conviction of **Count Three**, Defendant Sparks shall forfeit to the United States all property, real and personal, constituting or derived from any proceeds the defendant obtained directly and indirectly as a result of the violation incorporated by reference in this Allegation of

Forfeiture and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violation incorporated by reference in this allegation, including, but not limited to, a **money judgment of approximately \$4,160,000.00** in United States currency, and any interest and proceeds traceable thereto, in that at least this sum, in aggregate, was received in exchange for, or is traceable thereto, the unlawful distribution of more than 520 kilograms of methamphetamine, based on an average street price of \$8000.00 per kilogram of methamphetamine.

FIREARMS

Any firearms recovered during the investigation of this case, including, but not limited to, those specifically listed in **Counts Four, Five, and Six** above, as they were all used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations incorporated by reference in this allegation.

SUBSTITUTE ASSETS

If any of the above-described forfeitable property of the above-named defendants, as a result of any act or omission of the defendants –

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 18 U.S.C. § 982(a)(1) to seek forfeiture of any other property of said defendants up to the value of the above-described forfeitable property.

All in violation of Title 21, United States Code, Section 853, Title 18 U.S.C. § 982(a)(1) and pursuant to Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL.

/s/ Pamela Carter-Smith
FOREPERSON OF THE GRAND JURY

7/21/2020
DATE

/s/ Bruce Rhoades
Bruce Rhoades
Assistant United States Attorney
Western District of Missouri